

**REMARKS**

Applicants amend claims 1 and 6 and add claims 28-31. Accordingly, claims 1-10, 24 and 28-31 are all the claims pending in the application. Support for the amendment is at least found in paragraph 43 of the Specification.

***Formal matters***

Applicants note that the Examiner has not indicated if the drawings are accepted, and therefore respectfully request the Examiner to mark the appropriate box in the next Office Action.

***Claim rejection under 35 U.S.C. § 101***

Claim 24 is rejected under 35 U.S.C. § 101 because the claimed invention is allegedly directed to non-statutory subject matter.

In view of the claim amendments to claim 24 as suggested by the Examiner submitted with this Amendment, Applicants respectfully requests the Examiner to withdraw the 35 U.S.C. § 101 rejection.

***Claim rejection under 35 U.S.C. § 103(a)***

Claims 1, 6, and 24 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Edholm (U.S. 6,772,210) in view of Duvvury (U.S. 6,917,626) and Young (U.S. Publication No. 2003/0093563). Claims 2, 3, 7 and 8 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Edholm, Duvvury and Young and further in view of Yoon (U.S. Publication No. 2001/0047414). Claims 4, 5, 9, and 10 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Edholm, Duvvury, Young and further in view of

Kim (U.S. Publication No. 2002/0035624). Applicants traverse the rejection for at least the following reasons.

Claim 1

Claim 1 recites, *inter alia*, “a gateway having a first private internet protocol (IP) address, which is an address of a relay of the duplicate private network.” The Examiner concedes that Edholm does not disclose the feature recited above. However, the Examiner relies on Duvvury to disclose the features missing in Edholm.

Duvvury is directed to a method of automatic address assignment for network devices in a cluster. Duvvury discloses that a group of network devices are logically configured as a single cluster, with one commander device and one or more member devices. Each device in the cluster is identified by a unique URL but only the cluster commander has a public IP address (column 6, line 62-column 7, line 15). However, Duvvury does not disclose that a gateway having a first private internet protocol (IP) address, which is an address of a relay of the duplicate private network.

Specifically, Duvvury discloses that a group of devices being managed as a single entity. Moreover, Duvvury discloses that all communication with the cluster switches is through a single public IP address assigned to the commander switch (column 10, lines 32-35). Therefore, Duvvury still discloses that the entire cluster is viewed as a single entity having a public IP address. Moreover, Duvvury does not disclose that each cluster member (the alleged gateway) is an address of a relay of the claimed duplicate private network.

Young also does not disclose the features missing in Edholm and Duvvury.

Furthermore, Edholm, Duvvury, and Young do not disclose “a duplicate private network” as recited in claim 1. In particular, the cited references do not disclose that the duplicate private network includes a primary private network constituted by a gatekeeper and a plurality of gateways and a secondary private network constituted by a gateway and a plurality of incoming and outgoing call terminals as recited in claim 1.

In view of the above, Applicants submit that claim 1 is allowable over the cited references.

Claims 6 and 24

Applicants submit that claims 6 and 24 recite subject matter analogous to claim 1, and therefore are allowable for at least the analogous reasons claim 1 is allowable.

Claims 2, 3, 7 and 8

Applicants submit that since claims 2, 3, 7 and 8 depend from claim 1 or 6 and since Yoon does not cure the deficiency noted above with respect to claim 1.

With regard to claim 2, Applicants submit that the cited references do not disclose the features recited therein.

Claim 2 recites, *inter alia*, “a private IP address allocation requesting message transmission unit that creates a message requesting private IP address allocation, including information of incoming and outgoing call terminals, directly connected to the gateway, to which private IP addresses are not allotted, and transmits the message to the gateway unless the second private IP address is allotted to the incoming and outgoing call terminal and a second private IP address allocation reception unit which is allotted the second private IP address from the gateway

in response to the reception of the message requesting private IP address allocation.” The Examiner concedes that Edholm, Duvvury and Young are silent about the features recited above. However, the Examiner alleges that Yoon discloses the features missing in Edholm, Duvvury and Young. Applicants disagree with the Examiner for at least the following reasons.

Yoon is directed to a service method for a constriction of networks having automatic back up and load balancing upon failures to network system. Yoon discloses a dedicated private network service method having load balancing function wherein the network backup is available since a bypass path is made to the normally operating IDC center upon failures to a specific IDC of IDCs dispersed in a plural places in a public IP networks with GLB serve, and load balancing as to entire server is available by constructing equipment changeable into private IP networks in case of connecting the IDC network (Abstract).

In the portion of the reference relied on by the Examiner, Yoon discloses that an authentication server 144 positioned in the private area network requests for private IP addresses for subscribers. In response to the request, the PPP server transmits the private IP addresses to the authentication server 144 and the authentication sever 144 transmits the IP addresses to the subscribers (paragraph 0080-0081).

However, Yoon does not disclose the incoming and outgoing call terminals comprises a private IP address allocation requesting message transmission unit that creates a message requesting private IP address allocation. Moreover, the private IP address allocation requesting message transmission unit incoming and outgoing call terminals is directly connected to the claimed gateway and transmits the message to the gateway and a second private IP address

allocation reception unit of the incoming and outgoing call terminals which is allotted the second private IP address from the gateway in response to the reception of the message requesting private IP address allocation. On the contrary, the authentication server 144 request IP address. Furthermore, Yoon discloses that at PPP server transmits the IP address to the authentication servers and does not disclose a direct connection to the gateway and receiving the second private IP address allocation from the gateway.

Claims 4, 5, 9, and 10

Applicants submit that since claims 4, 5, 9 and 10 depend from claim 1 or 6 and since Yoon and Kim do not cure the deficiency noted above with respect to claim 1, claims 4, 5, 9 and 10 are allowable over the cited reference.

***New claims***

Applicants submit that claims 25-28 are allowable over the cited reference at least by virtue of their dependency on claim 1. Furthermore, the cited references do not disclose the features recited in the newly added claims.

***Conclusion***

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111  
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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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